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**52 UNITED STATES DISTRICT COURT**  
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**54 NORTHERN DISTRICT OF CALIFORNIA**  
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**56 SAN JOSE DIVISION**

57 DR. ANDREW FORREST,  
 58 Plaintiff,  
 59 - against -  
 60 META PLATFORMS, INC.,  
 61 Defendant.

62 Case No. 22-cv-03699-PCP

63 **STIPULATION AND [PROPOSED]**  
**64 ORDER TO EXTEND CASE**  
**65 SCHEDULE**

66 The Hon. P. Casey Pitts

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Dr. Andrew Forrest and  
 2 Defendant Meta Platforms, Inc. (the “Parties”), by and through their respective counsel, submit  
 3 this stipulation and [proposed] order:

4 **WHEREAS**, on May 27, 2025, the Parties filed a joint revised proposed case schedule,  
 5 *see* ECF 215, which the Court approved the next day, *see* ECF 216;

6 **WHEREAS**, the joint revised case schedule set July 29, 2025 as the deadline for  
 7 substantial completion of document production, *see* ECF 215 at 2;

8 **WHEREAS**, the Parties have conferred and agree that there is good cause for a 30-day  
 9 extension of time for the Parties to substantially complete document production;

10 **IT IS HEREBY STIPULATED** that the substantial completion deadline is extended by  
 11 30 days, with corresponding extensions for subsequent deadlines, as follows:

<b>Event</b>	<b>Deadline</b>
Substantial completion of document production	<del>July 29, 2025</del> <b>August 28, 2025</b>
Completion of fact discovery	<del>September 29, 2025</del> <b>October 29, 2025</b>
Meta’s Motion for Summary Judgment on Section 230 defense and opening expert report(s) (if applicable)	<del>November 14, 2025</del> <b>December 15, 2025</b>
Dr. Forrest’s Opposition to Meta’s Summary Judgment Motion; Cross-Motion for Partial Summary Judgment (if applicable); and opening expert report(s) (if applicable)	<del>December 31, 2025</del> <b>January 30, 2026</b>
Meta’s Reply in Further Support of Summary Judgment; Opposition to Dr. Forrest’s Cross-Motion for Partial Summary Judgment (if applicable); and rebuttal expert report(s) (if applicable)	<del>January 30, 2026</del> <b>March 2, 2026</b>
Dr. Forrest’s Reply in Further Support of Partial Summary Judgment (if applicable) and rebuttal expert report(s) (if applicable)	<del>March 2, 2026</del> <b>April 1, 2026</b>

1 Dated: July 22, 2025

2 Respectfully submitted,

3 By:

4 /s/ John C. Quinn

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*Attorneys for Defendant Meta Platforms, Inc.*

1 **[PROPOSED] ORDER**  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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6 Dated: July 22, 2025  
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Hon. P. Casey Pitts  
United States District Judge